



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

JUL 05 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kirsten L. Erickson, Attorney-Adviser
NOAA General Counsel's Office
Herbert Hoover Office Building
Room 7837
14th & Constitution Ave., N.W.
Washington, D.C. 20230

Peter Knight (3HW02)
Coastal Resource Coordinator
U.S. Environmental Protection Agency
841 Chestnut Building
Philadelphia, PA 19107

Re: Stanley Kessler Site
Montgomery County, Pennsylvania
122(j) notification

Dear Ms. Erickson and Mr. Knight:

Pursuant to Section 122(j)(1) of CERCLA, I am writing to inform you of negotiations concerning actions to be taken in response to a release or threatened release of hazardous substances at the Stanley Kessler Site in King of Prussia, Montgomery County, Pennsylvania. Specifically, the U.S. Environmental Protection Agency ("EPA") will be negotiating a consent decree for remedial design and remedial action at the Site with the potentially responsible parties ("PRPs").

The National Oceanic and Atmospheric Administration ("NOAA") may be the trustee of certain natural resources at the Site pursuant to Executive Order 12580 and the National Contingency Plan, 40 CFR Part 300, Subpart G. EPA would welcome NOAA's participation in these negotiations if you determine that such participation is desirable at this time.

The Stanley Kessler Site is located within an industrialized area of King of Prussia, Montgomery County. Since 1960 the Stanley Kessler and Company, Inc. property has been operated as a facility where welding wire is degreased and respooled. Solvent degreasers have been used at the facility since 1963 and included trichloroethene (TCE) and 1,1,1-trichloroethane (1,1,1-TCA). Past operational practices related to the use of these solvents resulted in the degradation of soil and ground water at the Site. In 1979 the Stanley Kessler Company Inc. removed an underground

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waste neutralization system. This neutralization system consisted of two tanks which have historically been referred to as the septic tank (tank 1) and the cesspool (tank 2). Tank 1 consisted of a concrete vessel, containing crushed limestone to neutralize the acid, with a baffled overflow to tank 2. Tank 2 was a cinder block vessel which had no structural bottom and was open to native soils. In addition 60 to 80 cubic yards of contaminated soil and 120 gallons of liquid were removed.


Analysis of the soils, surface water and sediment indicate that these media are not being impacted by the Site. However the ground water is contaminated with volatile organics, predominately TCE and TCA.

If the ROD follows the Proposed Remedial Action Plan, the remedy for addressing the contaminated ground water at the Site is extraction and treatment by granular activated carbon with discharge to the onsite intermittent stream. This is the only operable unit planned for this Site.

EPA is in the process of generating a Pre-Referral Negotiation report for the Department of Justice. EPA has identified five PRPs for this Site consisting of the Stanley Kessler Company, Inc. and members of the Kessler family. The Stanley Kessler Company, Inc. performed the RI/FS. At this time, EPA anticipates that the PRPs will allege an inability to finance the remedial design/remedial action.

Please feel free to contact me at (215) 597-3216 if you have any questions regarding this matter.

Sincerely,


Ruth O'Connor
Remedial Project Manager
SE Penna Remedial Section

Enclosure: Proposed Plan

cc: W. Walters (3RC21)
Bill Hutchins, (DOJ)

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